Corning Incorporated
Corning, New York 14831
607-974-9000

E.6
12/1/94

CORNING

December 1, 1994

Heidi Valetkevitch
Community Relations Coordinator
Office of Public Affairs (P-19J)
U.S. EPA Region 5
77 West Jackson Boulevard
Chicago, IL 60604

Subject: Albion-Sheridan Township Landfill Superfund Site
Comments on Proposed Plan and Feasibility Study

Dear Ms. Valetkevitch:

Corning Incorporated has reviewed the Final Presumptive Remedy Feasibility Study and the Proposed Plan with U.S.EPA's recommended cleanup remedy for the Albion-Sheridan site. The following comments on the recommended alternatives are offered for the public record.

Waste Drums

1. Corning concurs with the Agency's recommendation for removal of an estimated 200 drums from one known location and the removal of any additional drums containing hazardous or liquid waste encountered during grading. It is our understanding that any drums found that contain non-hazardous solid waste would be left in the landfill as they pose no threat to ground water.

Landfill Cap

2. Corning concurs with the recommendation for a flexible membrane liner (FML) to cap the landfill rather than a clay cap. A synthetic liner will be a more effective barrier for reducing surface water infiltration.

3. Section 4.2.3 of the Feasibility Study recommends 30 mil PVC or 40 mil VLDPE for the liner material. Corning recommends a stronger and thicker material such as 40 to 60 mil HDPE for the liner. The sturdier liner material will be easier to install, is less likely to tear during installation, and will have better seam integrity.

4. In Figure 3.3, Alternative 3, the 6-inch sand drainage layer is placed between the cover soil and top soil layers. Corning recommends that the sand drainage layer be placed directly above the FML. This will provide more protection against punctures in the liner and a better drainage pathway for infiltrated water.

5. The composite liner system provides only 30 inches of cover for the FML. An additional 6-inches of cover soil should be added to ensure that the FML is below the frost line.

6. The proposed landfill cap contours (Figure 3.2) show steep slopes to the west and south. Some "cut and fill" regrading of the existing topography could reduce slope angles and provide better stability. This option should be considered during the Remedial Design phase.

Landfill Gas

7. Corning recommends that a passive gas venting system be installed as shown on Figure 3.9. The generation rate and composition of landfill should be evaluated during the Remedial Design phase. The interconnected piping and blower/flare facility of an active system should be added only if the gas concentrations exceed ARARs.

Ground Water

8. Corning concurs with the recommendation to conduct ground water monitoring for a period of 5 years following installation of the landfill cap. The reduced infiltration through the waste material and the natural attenuation of arsenic should mitigate the impacts to ground water at the site.

9. The ground water monitoring program for the site, as specified on page 3-15 of the Feasibility Study, includes 27 wells. It is Corning's understanding that 4 new wells will be installed during the Remedial Design phase and added to the long-term monitoring program. The wells will be sampled during quarterly and/or annual events.

10. The ground water analytical program has not been specified in the Feasibility Study or the Proposed Plan. Corning recommends that the analytical program include only the analytes of concern identified during the Remedial Investigation.

Corning Incorporated appreciates the opportunity to comment on the Feasibility Study and Proposed Plan for the Albion-Sheridan site. As one of the Potentially Responsible Parties for this site, Corning would appreciate timely notice of any additions or changes to the proposed remedies. Please call me at (607) 974-6399 if you have any questions or can provide any information.

Sincerely,

John D. Gray

John D. Gray
Sr. Environmental Control Engineer